

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) CR No.: 99-10383-JLT  
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v.                               )  
                                )  
                                )  
                                )  
DONALD COOK,                   )  
Defendant                       )

**MOTION TO MODIFY CONDITIONS OF RELEASE**

NOW COMES, Donald Cook, the defendant in the above-captioned matter and moves that conditions of his supervised release be modified to eliminate the need for him to spend time in community confinement.

In support, the defendant states that he was released from prison, has acquired a residence approved by probation, has acquired a full time job as a furniture mover and has taken well to the adjustment of life outside of prison. Although Mr. Cook agreed to this condition when his sentence was modified, by argument with the government, under the crack guideline changes, he has been informed that the purpose of the halfway house has already been fulfilled and that he should seek a modification.

According to Mr. Cook, his probation officer and he have discussed the matter and his probation officer has said that he supports Mr. Cook's effort to remove the halfway house condition from his supervised release.

Wherefore, this Court should hold a hearing to hear from Mr. Cook and make inquiry of his probation officer, Matthew Moore as to the advisability of modifying his terms of supervised release.

Respectfully submitted,  
**DONALD COOK**  
By his Attorney;

Dated: September 25, 2008

/s/ John LaChance  
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**CERTIFICATE OF SERVICE**

I, John H. LaChance, Esq., do hereby certify that I have served a copy of the same by electronically filing the same by means of the CM/ECF filing system to Assistant United States Attorney John Wortman assigned to prosecute this matter located at the Office of the United States Attorney, United States District Courthouse, One Courthouse Way, Suite 9200, Boston, MA 02110 on this 25<sup>th</sup> day of September 2008

/s/ John LaChance  
John H. LaChance, Esquire